

EXHIBIT G

**DECLARATION OF ANN M. O'LEARY IN SUPPORT OF DEFENDANTS'
OPPOSITION TO MOTION FOR PRELIMINARY INJUNCTION**

Money, workers gave Brown victory

Massive effort to get mayor's supporters to the polls pays off with a landslide win

ANCE WILLIAMS AND CHUCK FINNIE, OF THE EXAMINER STAFF

Wednesday, December 15, 1999

Mayor Willie Brown's huge financial advantage and his vaunted political field operation combined to turn out three voters for every two who supported Board of Supervisors President Tom Ammiano.

An analysis of the turnout and interviews with voters and political experts showed that the mayor won a landslide because his aggressive get-out-the-vote effort - and those of several well-financed soft-money campaigns - got both Brown's core supporters and many backers of erstwhile candidates Frank Jordan and Clint Reilly to the polls.

Precinct-by-precinct vote breakdowns were not available from the Department of Elections Wednesday morning.

But in many neighborhoods where Brown ran strongest last month, voter turnout increased significantly over the November general election. In Bayview/Hunters Point, where Brown piled up an 80 percent margin in November, turnout surged 15 percent - from 6,400 to 7,500 voters.

Brown's campaign had organized extensive get-out-the-vote efforts, even running buses from Hunters Point to City Hall last week so that voters could cast their ballots early.

Meanwhile, in the neighborhoods where the Ammiano write-in campaign had the most traction six weeks ago, turnout appeared to have increased only slightly. In the Mission, where Ammiano won 47 percent of the vote in November, turnout was up by about 1,000 votes - or 2 percent. Ammiano had targeted the Mission for both voter registration and get-out-the-vote efforts.

But in parts of The City where the campaigns of former Mayor Jordan and political consultant Reilly, who endorsed Ammiano, ran strongest in November - the Marina and Pacific Heights, the Sunset District and precincts west of Twin Peaks - voter turnout was up more than 7 percent, and there were indications Brown was the beneficiary.

Brown's campaign had targeted

conservative voters in those neighborhoods. And the soft-money campaign of San Franciscans for Sensible Government, a pro-Brown committee formed by downtown business interests, had mounted a major effort to rally Asian American voters to Brown.

In all, Brown spent more than \$3 million on his re-election, six times what Ammiano spent. Brown's re-election also was boosted by independent committees run by business and political organizations. They may have spent as much as \$2 million electioneering for Brown, San Francisco Common Cause has estimated.

David Lee, executive director of the Chinese American Voters Education Committee, said there were other signs the Brown campaign had connected with west side voters.

In one precinct, we saw half of the absentee voters had Chinese surnames," he said. "That told us that the independent expenditure campaign, the sensible government committee, had worked, because they spent funds specifically" to persuade Asian American voters to cast absentee votes for the mayor.

Lee said his organization had spent much of election day tracking the get-out-the-vote effort at key precincts. Everywhere he went, Lee said, he saw Brown campaign workers checking voter lists and going door to door to get out the vote. He said that was even true in the Mission, an Ammiano stronghold in

November.

Lee said he encountered as many as four different Brown election teams in the Mission, including one that was part of a contingent of Democratic legislative staffers who came down from the state Capitol.

"I ran into one guy with a map, trying to find his way around the Mission," Lee said. "He was in a car with guys from Sacramento."

Campaign workers from yet another pro-Brown soft-money effort - this one mounted by the county Democratic Central Committee - also were working the Mission on election afternoon, Lee said.

Ammiano's forces were far less

on evidence, he said. That suggested that Ammiano's low-budget campaign simply couldn't match Brown's election-day blitz.

Election-day interviews indicated that many swing voters were breaking for the mayor.

At a Pacific Heights polling place at the corner of Union and Broderick where enormous homes command stunning Bay views, voters arrived in late-model Mercedes sedans and Volvo station wagons - and they voted for Brown.

On November, the precinct went solidly for Jordan.

Fred Nelson, 54, a lawyer and homeowner, said that with Jordan out of the race, it was vital to support Brown's re-election.

"I think it is important to the economy of this city," Nelson said. "I think Tom Ammiano would be bad for business and I think people in this neighborhood would be taxed unfairly."

Cecilia Bendett, a 42-year-old "stay-at-home" mom and homeowner who described herself as a moderate, said she worried that Ammiano wasn't ready to lead The City.

Brown "has done a pretty good job," Bendett said. "Ammiano is not prepared."

Across town, voters in the Alice Griffith housing project, also known as Double Rock, in Hunters Point also liked the mayor because of the economy.

Fammy Jackson, 30, said she voted for Brown because "he helped a lot of people get jobs - he favored the new stadium" for the San Francisco 49ers pro football team. Brown has contended that the proposed stadium-mall project measure would provide an economic jump-start for the Bayview.

Shanay Carter, 19, who lives in the Potrero Terrace project, said she had mailed in an absentee vote for Brown.

"He's been good for our community," she said.

Interviews indicated that only in the Castro District did Ammiano clearly beat Brown. In a neighborhood where voters went to the polls to elect the country's first openly gay mayor, a vote for Am

niano was almost like voting for kin.

"I have a personal connection," said Ed Buckley, 43, leaving a polling station on Sharon Street, near Market and Sanchez streets.

Buckley, like Ammiano earlier in his career, is a teacher in the San Francisco Unified School District.

"He's a friend. I like Willie, too. He's a great guy. But, with things going well, this is the time to take a chance on something different."

Castro voter James Orlando, 34, a psychotherapist, said Ammiano is "in touch" with San Francisco.

"He seems to put the interest of San Francisco first. I think he is honest," Orlando said.

Brown, meanwhile, has been a disappointment, according to Orlando.

"Willie Brown is powerful," he said. "He has done quite a lot for San Francisco, but not for San Franciscans. He has a great personality. If he didn't have to run a city with people in it, he would be my first choice."

In the Mission, where the Ammiano campaign undertook a registration drive that put thousands more voters on the rolls, Brown still made inroads, interviews indicated.

Ammiano picked up the vote of Natalie Scott, a Russian immigrant who worked for more than 30 years in the old Corset dress factory in The City.

Scott backed Reilly in the general election, but voted for Ammiano in the runoff because she thinks he "will be more close to the people."

But Ammiano came in for harsh words from another Mission voter.

Meredith Grier, 41, criticized the Board of Supervisors president for campaign remarks suggesting the mayor was guilty of wrongdoing in connection with an ongoing FBI probe of city contracting practices.

"Ammiano ran a smear campaign," Grier said. "I don't trust anybody who runs on a morality campaign."

Meanwhile, in the Sunset, the soft-money campaign that targetted voters of Asian descent seemed

to be paying big dividends for Brown.

Mark Mosher, spokesman for the San Franciscans for Sensible Government independent campaign, said the group had phoned 30,000 Asian American households on the west side of The City urging support for the mayor.

The effort was augmented by 60 precinct walkers and 125,000 pieces of bilingual campaign mail, Mosher added.

Raymond Capulong, 64, a Filipino immigrant, didn't vote in November but turned out Tuesday at his 40th Avenue precinct for the mayor.

"I know he is good for San Francisco, because there are so many jobs," Capulong said. "A lot of people go to work."

At a branch library on Ortega Avenue, retirees Stella Hasapas and her sister voted to re-elect the mayor, too.

"I think he has done a fairly good job. Nobody is perfect. We haven't had a perfect mayor for a long time," Hasapas said. George Christopher, who ran The City from 1956-64, was the last perfect chief executive, she said.

Hasapas said she likes Brown's outsized personality, something that rubs other voters wrong.

"A mayor of San Francisco should have a good personality. He needs a persona," she said. "This isn't just any city." <

<http://sfgate.com/cgi-bin/article.cgi?f=/e/a/1999/12/15/NEWS3655.dtl>

This article appeared on page **A - 18** of the Examiner